

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF TENNESSEE
NASHVILLE DIVISION

Motion GRANTED
conditioned upon the timely
filing of a waiver of speedy
trial by co-defendant.

UNITED STATES OF AMERICA

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v.

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No. 3:13-00139

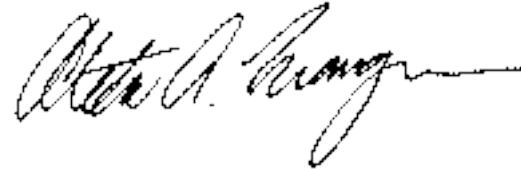
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JUDGE TRAUGER

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FALLON SABLAN

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MOTION AND INCORPORATED MEMORANDUM
TO CONTINUE TRIAL

NOW comes the defendant, FALLON SABLAN, through counsel, and respectfully requests that this Honorable Court enter an order granting a continuance of her trial date, presently set for September 30, 2014. Furthermore, counsel moves, pursuant to the Federal Rules of Criminal Procedure Rule 12(c), that this Honorable Court grant an extension of the pre-trial motions filing deadline. In support of said request, counsel submits the following:

Ms. Sablan has been charged with separate Hobbs act robberies as well as 924(c) violations. Counsel has recently acquired a voluminous amount of additional discovery materials which needs to be reviewed. After this opportunity, Counsel needs additional time to discuss with the Government, as well as with his client, a possible resolution of the case. The Government has no opposition to this motion.

18 U.S.C. § 3161(h)(8)(A) provides, in pertinent part, that any period of delay resulting from a continuance granted on the basis of a court's findings that the ends of justice served by granting of a continuance outweigh the best interests of the public and the defendant in a speedy trial shall be excluded in computing the time within which the trial must commence.